

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AND NOW, come Peter Frorer (“**Mr. Frorer**”); FRORER PARTNERS, L.P. (“**Frorer Partners**”), FRORER ASSOCIATES, LLC (“**Frorer Assoc.**”), FCF CREDIT, INC. (“**FCF**” and together with Forer, Frorer Assoc. and Frorer Partners, collectively, “**Frorer**”), and TRIPARTITE, LLC (“**Tripartite**”) (all collectively the “**Movants**”), by and through their counsel, FELLHEIMER & EICHEN LLP, and move to quash and/or for protective order from the Subpoena upon Mark Carrow, CPA, individually and representative of Citrin Cooperman in the above-captioned Adversary Proceeding. Pursuant to FED. R. BANKR. P. 9016 and FED. R. CIV. P. 45(d) and in support of their Motion to Quash and/or for Protective Order, the Movants incorporate herein by reference the Brief filed contemporaneously herewith and the Exhibits attached thereto pursuant to FED. R. CIV. P. 10(c).

Respectfully submitted,

**FELLHEIMER & EICHEN LLP**

Dated: December 5, 2016

By: /s/ Alan S. Fellheimer

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